

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KEANNA CURTIS and MIRANDA JANE
BENNETT-MORALES, Individually and
On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A., and
EARLY WARNING SERVICES, LLC
D/B/A ZELLEPAY.COM

Defendants.

No. 1:22-cv-10286-LGS

DECLARATION OF WILLIAM A. GARRETT

I, William A. Garrett, of lawful age, being duly sworn, declare as follows:

1. I am an Executive Director and Assistant General Counsel for JPMorgan Chase Bank, N.A. (“Chase”). In my capacity as Executive Director and Assistant General Counsel, I have access to information in the normal course of business regarding certain of Chase’s banking operations and practices, including its record of accountholders who have elected to opt out of arbitration. I also have access through Chase’s system to information and documents relating to Chase deposit accountholders, including plaintiffs Keanna Curtis and Miranda Jane Bennett-Morales. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my review of Chase business records as maintained by Chase in the ordinary course of business, and my knowledge as an Executive Director with Chase. If called to testify in this matter, I could competently testify as to the facts set forth herein.

2. Chase's Deposit Account Agreement and Privacy Notice ("DAA") permits customers to opt out of arbitration either by calling a toll-free number or by contacting a Chase banker, as set forth in the DAA.


3. Chase tracks these DAA opt-out requests, and others, from accountholders in its records.

4. Chase's records do not reflect any opt-out request from Ms. Curtis with respect to her College Checking account ending 1886.

5. Chase's records do not reflect any opt-out request from Ms. Bennett-Morales with respect to her Total Checking account ending 0258 or her Savings account ending 8139.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 15, 2023



William A. Garrett
Executive Director and Assistant General Counsel
JPMorgan Chase Bank, N.A.